

October 19, 2007

Dear Sirs:

I am writing to provide marine operator's comments to **WT Docket No. 07-230**.

I registered my VHF radio with BoatUS under the understanding that it was the same as registering with the FCC. My radio will have to be returned to the manufacturer to clear the BoatUS number as it is limited to the number of registrations it can service.

I assumed that if I wanted to get an international registration that I would have the same number and would only have to provide any additional information to the FCC to continue to use my radio.

It seems to me that the fix to the problem is to just import the BoatUS and any other entities registering the numbers for the FCC into the FCC database. You can maintain a table of the ranges of those numbers in your system if you need to determine where they originated or you can add an attribute of the issuer to the database.

Relatedly, the expanded vessel descriptive data that the FCC currently requires on applications for ship station licenses can be acquired without assigning new numbers. It can be acquired via a request to the registered operator or as the GMDSS Task Force recommends: that the Commission require incumbent licensees to provide the expanded data when they apply for license renewal. No other changes in FCC procedures should be required.

Please don't let the FCC lack of system foresight restrict where we can sail our vessels as well as becoming an administrative and cost burden for us operators.

Sincerely,

Charles E. Jones